

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

<b>In re:</b>	:	
	:	<b>Case No.: 20-20039-JAD</b>
<b>Jordan Manos AKA Jordan Emanuele-Manos, DBA Enlightened Roads Construction Company Debtor(s).</b>	:	<b>Chapter 13</b>
	:	<b>Judge Jeffery A. Deller</b>
	:	<b>* * * * *</b>
<b>Movant</b>	:	
	:	<b>Related to Document No. 167</b>
<b>Conconstruction Company, Thomas Manos, Ronda J. Winnecour, Trustee</b>	:	<b>Date of Hearing</b>
	:	<b>September 14, 2022 at 10:00 AM</b>
<b>v.</b>	:	
<b>PNC Bank, National Association Respondent</b>	:	

**RESPONSE TO OBJECTION TO CLAIM (DOCKET # 167)**

Now comes PNC Bank, National Association ("Creditor") by and through its attorneys, Manley Deas Kochalski LLC, and responds to the Objection to Claim number 17 filed by Jordan Manos AKA Jordan Emanuele-Manos, DBA Enlightened Roads Construction Company ("Debtor") on August 12, 2022 as follows:

Creditor asserts that the subject loan is a debt of the Debtors. Debtor's Schedule F acknowledges the debt to Creditor as that of the Debtor.

Creditor is currently retrieving documentation to substantiate Debtor's liability for the subject debt, and requests an additional thirty (30) days in which to provide such documentation.

WHEREFORE, Creditor respectfully requests that a hearing be held on the matter and that the objection be overruled.

Respectfully submitted,

/s/ Adam B. Hall

Stephen R. Franks, Esquire (0075345)  
Adam B. Hall (323867)  
Edward H. Cahill (0088985)  
Manley Deas Kochalski LLC  
P.O. Box 165028  
Columbus, OH 43216-5028  
Telephone: 614-220-5611  
Fax: 614-627-8181  
Attorneys for Creditor  
The case attorney for this file is Stephen R.  
Franks.  
Contact email is [srfranks@manleydeas.com](mailto:srfranks@manleydeas.com)

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**CERTIFICATE OF SERVICE OF RESPONSE TO OBJECTION TO CLAIM**

I certify under penalty of perjury that I served the above captioned pleading on the parties at the addresses specified below or on the attached list on (date) 08/26/2022.

The type(s) of service made on the parties (first-class mail, electronic notification, hand delivery, or another type of service) was: first-class mail and electronic notification.

If more than one method of service was employed, this certificate of service groups the parties by the type of service. For example, the full name, email address, and where applicable the full name of the person or entity represented, for each party served by electronic transmission is listed under the heading "Service by NEF," and the full name and complete postal address for each party served by mail, is listed under the heading "Service by First-Class Mail."

EXECUTED ON: 08/26/2022

By: Adam B. Hall  
Signature  
Adam B. Hall, Esquire  
Typed Name  
P.O. Box 165028, Columbus, OH 43216-5028  
Address  
614-220-5611  
Phone No.

323867

List Bar I.D. and State of Admission

Stephen R. Franks, Attorney for Creditor, Manley Deas Kochalski LLC, P.O. Box 165028, Columbus, OH 43216-5028 (notified by ecf)

Office of U.S. Trustee, Party of Interest, (Registered address)@usdoj.gov (notified by ecf)

Ronda J. Winnecour, Chapter 13 Trustee, Suite 3250, USX Tower, 600 Grant Street, Pittsburgh, PA 15219, cmevf@chapter13trusteewdpa.com (notified by ecf)

Michael S. Geisler, Attorney for Debtor, 201 Penn Center Blvd., Suite 524, Pittsburgh, PA 15235, m.s.geisler@att.net (notified by ecf)

Jordan Manos AKA Jordan Emanuele-Manos, DBA Enlightened Roads Construction Company and Thomas Manos, Debtor, 4733 Verona Road, Verona, PA 15147 (notified by regular US Mail)